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MAR 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M. Street, N.W., Room 202
Washington, D.C. 20554

March 26, 1993

Re: PP Docket No. 93-21
Sports Migration Inquiry

Dear Ms. Searcy:

Transmitted on behalf of the The Colorado Athletic Conference

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MAR 29 1993

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of Section 26 of the) PP Docket No. 93-21
Cable Television Consumer Protection)
and Competition Act of 1992)
)
Inquiry into Sports Programming)
Migration)
)

COMMENTS OF THE COLORADO ATHLETIC CONFERENCE

The Colorado Athletic Conference ("Conference") submits these comments in response to the Commission's Notice of Inquiry ("Notice") in this proceeding. Prime Sports Network ("PSN") provides cable carriage of certain sports events featuring Conference teams, including two women's volleyball games, four women's basketball games, and six men's basketball games. The Conference has been unable to obtain broadcast television coverage of these or other events featuring Conference teams.

Although the Notice states that the Commission intends to focus on professional sports and college football and basketball, it solicits "data on other sports as appropriate." Notice at ¶¶5, 10. It also seeks information about cable carriage of sports "programming that otherwise would not have been transmitted via video at all," and specifically questions whether the public is "better served by the current mix [of broadcast and

cable sports programming] than it was before?" Id. at ¶30. If not for PSN, television viewers in this area would not have the opportunity to see sports events involving Conference teams.

The Colorado Athletic Conference is comprised of the following "Division II" colleges and universities: Colorado Christian University; Metropolitan State College of Denver; Regis University; University of Denver; University of Colorado at Colorado Springs; University of Southern Colorado; Fort Lewis College; and the United States Air Force Academy (women's program only). Broadcast television stations generally have not been interested in televising sports events featuring Conference teams, presumably because the Conference is not as widely recognized as other collegiate sports conferences and stations do not anticipate sufficient advertising revenues to support coverage of Conference games.

However, PSN provides cable carriage, on a tape-delay basis, of a twelve-game schedule of sports events produced each year by the Conference involving Conference teams. The Conference retains the services of an independent production company to tape the games and makes those games available to be televised on PSN. Despite the fact that the Conference pays the production costs, broadcast stations and networks have not expressed interest in televising these Conference games. Thus, PSN has provided the only real television exposure for Conference teams.

Because broadcast television stations and networks have not expressed interest in televising the Conference games carried on PSN, or any of the numerous other Conference athletic events, there has been no real "migration" of Conference sports events from broadcast television to cable. However, the Conference member schools and television viewers interested in Conference events are better off under the current mix of broadcast and cable sports events because at least some Conference games which would not otherwise be available on broadcast television are available on PSN. The member schools, which generally are smaller colleges and universities without substantial state funding, receive significant benefits from such increased television exposure in their efforts to recruit students. In short,

without PSN, the member schools would be forced to rely on broadcast television for the majority of their sports events, which would result in a significant loss of revenue and a corresponding loss of the ability to recruit students.